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February 13, 2012

VIA FACSIMILE (212-805-6737)

Hon. George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SOORDERED:

JULIA B. DONGE GOOGE Daniels, U.S.D.J.

Dated: FEB 1 4 2012

Re: Sokolow v. Palestine Liberation Org., 04-CV-397(GBD)(RLE)

Dear Judge Daniels:

I am writing in reference to the upcoming deadlines for Defendants' briefing on their Motion for Partial Judgment on the Pleadings (DE 186) ("Motion"). Defendants filed and served their Motion on January 3, 2012. Plaintiffs' opposition was due on January 20, 2012. On January 23, 2012, Plaintiffs requested an extension until January 30 to file their opposition. The Court granted Plaintiffs' request. On January 30, the day of the extended deadline, Plaintiffs moved for a further extension of time, until February 6, 2012. The Court again granted Plaintiffs' request.

In their opposition papers (DE 196), Plaintiffs have urged the Court to treat the Motion as one seeking summary judgment, and they have cross-moved for Rule 56(d) discovery (DE 199, DE 200, DE 201). Defendants' reply in support of their Motion is due on Thursday, February 16, 2012. Defendants' opposition to Plaintiffs' cross-motion for Rule 56(d) discovery is due Friday, February 24, 2012.

Defendants seek leave from the Court to file a single consolidated document that would be comprised of both the reply and the opposition, and they request that the Court permit them to file such a consolidated document on Friday, February 24, 2012 — the latter of the two applicable deadlines. Defendants also request that the Court allow them 35 pages for the consolidated filing, which represents the full number of pages that Defendants would otherwise be entitled for each document (25 [opposition] + 10 [reply] = 35 [total]).

Given the overlap inherent in Plaintiffs' opposition and cross-motion, Defendants believe that this is the most efficient way to proceed. Doing so would avoid a piecemeal approach to the issues, requiring the court to shift between two responsive filings, with substantial repetition.



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Counsel for Plaintiffs' have indicated that they do not object to this request.

Sincerely,

Mark J. Ro

ce: Robert J. Tolchin, Esq. (via fax)